## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

-----

ETHICON WAVE 8 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF LARRY T. SIRLS, II, M.D. FOR WAVE 8

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Larry T. Sirls, II for Ethicon Wave 2, Dkt. 2479 (motion), 2480 (memorandum in support). Plaintiffs respectfully request that the Court exclude Larry T. Sirls, II's testimony, for the reasons expressed in the Wave 2 briefing. This notice applies to the following Wave 8 cases identified in Exhibit A attached hereto.

Dated: October 16, 2018 Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 816-701-1102 Fax 816-531-2372 tcartmell@wcllp.com

## **EXHIBIT A**

Warner, Jean	2:14-cv-19117
-	
Anderson, Corlis	2:13-cv-10032
Barber, Rachel Marie	2:16-cv-11928
Bredlow, Joy L.	2:13-cv-33415
Carlon, Debra	2:16-cv-11121
Clemons, Debra & Karry	2:15-cv-02655
Cotton, Clara & Zack	2:14-cv-16852
Dunlap, Donna F. & Vernon	2:14-cv-11689
ElQuesny, Pilar & Mongy	2:15-cv-13288
Engstrom, Miriam & John	2:17-cv-04172
Essenyi, Jennifer	2:16-cv-09839
Hoy, Lilyan	2:15-cv-08089
Jackson, Rita	2:13-cv-23744
Kimble, Debra & Allan	2:15-cv-09555
Miller, Deborah	2:15-cv-08553
Morales, Lydia Rodriguez	2:17-cv-03029
Peterson, Pamela & David	2:14-cv-30125
Poore, Melody & Ronald	2:15-cv-03182
Rockafellow, Karen	2:17-cv-00745
Rolandson, Janet	2:15-cv-02446
Foster, Alice	2:13-cv-06679

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett\_\_\_\_\_

D. Renee Baggett
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com